

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOCKHEED MARTIN TRANSPORTATION SECURITY
SOLUTIONS, AN OPERATING UNIT OF LOCKHEED
MARTIN CORPORATION,

No. 09 cv 4077 (PGG)(GWG)

Plaintiff,

-against-

MTA CAPITAL CONSTRUCTION COMPANY and
METROPOLITAN TRANSPORTATION AUTHORITY,

Defendants.

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TRAVELERS CASUALTY AND SURETY COMPANY
OF AMERICA, FEDERAL INSURANCE COMPANY,
and SAFECO INSURANCE COMPANY OF AMERICA,

No. 09 cv 6033 (PGG)(GWG)

DECLARATION OF
MICHAEL J. GRESS

Plaintiff,

-against-

METROPOLITAN TRANSPORTATION AUTHORITY,
MTA CAPITAL CONSTRUCTION COMPANY, NEW
YORK CITY TRANSIT AUTHORITY, and LOCKHEED
MARTIN CORPORATION,

Defendants.

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I, MICHAEL J. GRESS, pursuant to 28 U.S.C. § 1746(2), declare the following to be true
and correct under the penalty of perjury:

1. I am a Project Executive for Five Star Electric Corp. ("Five Star") and a custodian
of Five Star's records as it relates to the Integrated Electronic Security System Project ("IESS"
or "IESS Project"), the project which is the subject of this lawsuit.

2. During the course of the IESS Project, I was promoted from Senior Project
Manager to Project Executive. As both Senior Project Manager and Project Executive, I was
responsible for overseeing Five Star's subcontractor work for Plaintiff Lockheed Martin
Transportation Security Solutions ("TSS"), an Operating Unit of Lockheed Martin Corporation